UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LINDA HIRSHMAN,

Case No. 20 Civ. 06322 (GHW)

Plaintiff,

ORAL ARGUMENT REQUESTED

-against-

DON FRANZEN,

Defendant.

DEFENDANT DON FRANZEN'S NOTICE OF MOTION TO COMPEL ARBITRATION AND STAY THIS MATTER

PLEASE TAKE NOTICE THAT Defendant Don Franzen, upon his Memorandum of Law in Support of his Motion to Compel arbitration and Stay this matter, and the October 9, 2020 Declaration of Don Franzen and the exhibits thereto; and upon all pleadings and prior proceedings herein, will move this Court, before the Honorable Gregory H. Woods, U.S.D.J., United States Courthouse, 500 Pearl St., New York, New York 10007, at a date and time to be determined by the Court, for an Order, pursuant to 9 U.S.C. §§ 3 and 4, compelling Plaintiff Linda Hirshman to arbitrate the dispute underlying this matter and to stay this matter pending resolution of the arbitration, or both.

Dated: New York, New York October 9, 2020

Respectfully submitted,

BAILEY DUQUETTE, P.C.

By:

David I. Greenberger, Esq. Shashi K. Dholandas, Esq.

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on October 9, 2020, per Local Civil Rule 5.2.

David I. Greenberger